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CAPLIN & DRYSDALE, CHARTERED
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Co-Counsel for the Official Committee of Asbestos Claimants

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:	:	Chapter 11
	:	
DURO DYNE NATIONAL CORP., <i>et al.</i> , ¹	:	Case No. 18-27963-MBK
	:	
Debtors.	:	(Jointly Administered)
	:	

**FIFTEENTH MONTHLY FEE STATEMENT OF
CAPLIN & DRYSDALE, CHARTERED FOR THE PERIOD
FROM JANUARY 1, 2020, THROUGH JANUARY 31, 2020**

Caplin & Drysdale, Chartered (“**Caplin & Drysdale**” or the “**Applicant**”), counsel for the Official Committee of Asbestos Claimants (the “**Committee**”), hereby submits this fifteenth monthly fee statement² for the period commencing January 1, 2020, through January 31, 2020 (the “**Fifteenth Fee Statement**”) pursuant to the *Administrative Fee Order Establishing Certain Procedures for Allowance of Interim Compensation and Reimbursement of Expenses of Professionals Retained by Order of this Court*, dated December 18, 2018 (Docket No. 345) (the “**Interim Compensation Order**”).

¹ The “**Debtors**” in these chapter 11 cases, along with the last four digits of each Debtor’s tax identification number, are Duro Dyne National Corp. (4664), Duro Dyne Machinery Corp. (9699), Duro Dyne Corporation (3616), Duro Dyne West Corp. (5943), and Duro Dyne Midwest Corp. (4662).

² Caplin & Drysdale’s first monthly fee statement was also filed as an interim fee application under the title *First Interim Fee Application of Caplin & Drysdale, Chartered for Allowance of Fees and Reimbursement of Expenses* on December 14, 2018 (Docket No. 337).

Pursuant to the Interim Compensation Order, responses to the Fifteenth Fee Statement, if any, are due by March 6, 2020.

Dated: February 25, 2020

By: /s/ James P. Wehner
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*Counsel to the Official Committee of Asbestos
Claimants*

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

D.N.J. LBR 2016-1, FEE APPLICATION COVER SHEET

Debtor: Duro Dyne National Corp., et al.¹ Applicant: Caplin & Drysdale, Chartered
Case No.: 18-27963 (MBK) Client: Official Committee of
Asbestos Claimants
Chapter: 11 Case Filed: September 7, 2018

COMPLETION AND SIGNING OF THIS FORM CONSTITUTES A CERTIFICATION
UNDER PENALTY OF PERJURY, PURSUANT TO 28 U.S.C. SECTION 1746

RETENTION ORDER(S) ATTACHED AS EXHIBIT B

**FIFTEENTH MONTHLY FEE STATEMENT² OF
CAPLIN & DRYSDALE, CHARTERED FOR THE PERIOD
FROM JANUARY 1, 2020, THROUGH JANUARY 31, 2020**

**SECTION 1
FEE SUMMARY**

	<u>FEES</u>	<u>EXPENSES</u>
TOTAL PREVIOUSLY REQUESTED	<u>\$1,675,916.25</u>	<u>\$30,998.11</u>
TOTAL ALLOWED TO DATE	<u>\$1,640,949.02</u>	<u>\$29,980.59</u>
TOTAL RETAINER (IF APPLICABLE)	<u>\$0.00</u>	<u>\$0.00</u>
TOTAL HOLDBACK (IF APPLICABLE)	<u>\$45,303.25</u>	<u>\$0.00</u>
TOTAL RECEIVED BY APPLICANT	<u>\$1,573,514.80</u>	<u>\$29,386.26</u>
 FEE TOTALS –PAGE 2	 <u>\$23,664.00</u>	
DISBURSEMENTS TOTALS – PAGE 3	<u>\$802.74</u>	
TOTAL FEE APPLICATION	<u>\$24,466.74</u>	
MINUS 20% HOLDBACK	<u>\$4,732.80</u>	
AMOUNT SOUGHT AT THIS TIME	<u>\$19,733.94</u>	

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² Caplin & Drysdale’s first monthly fee statement was also filed as an interim fee application under the title *First Interim Fee Application of Caplin & Drysdale, Chartered for Allowance of Fees and Reimbursement of Expenses* on December 14, 2018 (Docket No. 337).

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED	HOURS	RATE	FEES
James P. Wehner, Member	1995	9.2	\$795	\$7,314.00
Jeffrey A. Liesemer, Member	1993	17.5	\$795	\$13,912.50
Cecilia Guerrero, Paralegal	N/A	5.0	\$340	\$1,700.00
Brigette A. Wolverton, Paralegal	N/A	2.5	\$295	\$737.50
TOTAL FEES		34.2		\$23,664.00
ATTORNEY BLENDED RATE			\$691.93	

**SECTION II
SUMMARY OF SERVICES**

SERVICES RENDERED	HOURS	FEE
(.01) Asset Analysis and Recovery	0.0	\$0.00
(.03) Business Operations	0.0	\$0.00
(.04) Case Administration	0.4	\$136.00
(.05) Claims Administration and Objections	0.0	\$0.00
(.07) Fee Applications-Self	3.9	\$1,549.00
(.09) Financing	0.0	\$0.00
(.10) Litigation	2.1	\$1,669.50
(.11) Plan and Disclosure Statement	24.0	\$18,980.00
(.12) Relief from Stay Proceedings	0.0	\$0.00
(.13) Tax Issues	0.0	\$0.00
(.15) Committee Meetings/Conferences	0.0	\$0.00
(.16) Travel Time	0.0	\$0.00
(.17) Docket Review & File Maintenance	2.2	\$649.00
(.18) Fee Applications-Others	1.6	\$680.50
(.19) Retention Applications-Others	0.0	\$0.00
(.20) Retention Applications-Self	0.0	\$0.00
(.22) Review Fee Application-Other Parties	0.0	\$0.00
SERVICE TOTALS:	34.2	\$23,664.00

**SECTION III
SUMMARY OF DISBURSEMENTS**

DISBURSEMENTS	AMOUNT
Computer Assisted Legal Research	\$0.00
Conference Call Charges	\$0.00
Courier & Express Carriers	\$0.00
Court Reporting	\$0.00
Fax	\$0.00
Filing Fees	\$0.00
Other Research	\$0.00
Pacer Fees	\$582.80
Postage	\$0.00
Reproduction Services - In-house	\$0.00
Reproduction Services - Outside	\$0.00
Travel	\$0.00
Other (specify): eDiscovery, filing fees	\$219.94
DISBURSEMENTS TOTAL:	\$802.74

**SECTION IV
CASE HISTORY**

(NOTE: Items 3 - 6 are not applicable to applications under 11 U.S.C. § 506)

- (1) DATE CASE FILED: September 7, 2018
- (2) CHAPTER UNDER WHICH CASE WAS COMMENCED: 11
- (3) DATE OF RETENTION: November 8, 2018, effective as of September 26, 2018 [Docket No. 258]. *See* Order attached.
- (4) SUMMARIZE IN BRIEF THE BENEFITS TO THE ESTATE AND ATTACH SUPPLEMENTS AS NEEDED:
 - a) Caplin & Drysdale analyzed issues related to the Plan and Plan documents, including potential revisions of Plan documents;
 - b) Caplin & Drysdale reviewed pleadings and correspondence regarding relief from stay;
 - c) Caplin & Drysdale prepared and filed fee applications;
 - d) Caplin & Drysdale assisted in the preparation of fee applications for other Committee professionals;
 - e) Caplin & Drysdale spent time working with counsel for the other Plan proponents and internally on general case matters, and status issues, as well as organizing and maintaining the case filing system and docket review for the bankruptcy case;

f) Caplin & Drysdale performed other professional services as counsel for the Committee as necessary and appropriate in these chapter 11 cases.

(5) ANTICIPATED DISTRIBUTION TO CREDITORS:

- (A) ADMINISTRATION EXPENSES: (unknown at this time)
- (B) SECURED CREDITORS: (unknown at this time)
- (C) PRIORITY CREDITORS: (unknown at this time)
- (D) GENERAL UNSECURED CREDITORS: (unknown at this time)

(6) FINAL DISPOSITION OF CASE AND PERCENTAGE OF DIVIDEND PAID TO CREDITORS (IF APPLICABLE): Final disposition of case and dividend are unknown at this time.

I certify under penalty of perjury that the above is true.

Date: February 25, 2020

/s/ James P. Wehner
Signature

EXHIBIT

A



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Official Committee of Asbestos Claimants of Duro Dyne National

February 21, 2020

Invoice #: 325354

Page: 1

RE: Duro Dyne Bankruptcy

For Professional Services Rendered Through January 31, 2020

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.04 Case Administration & Calendar Control					
1/29/2020	CG	Update docketing calendar.	0.2	\$340.00	\$68.00
1/30/2020	CG	Update docketing calendar.	0.2	\$340.00	\$68.00
Total			0.40		\$136.00
.07 Fee Applications-Self					
1/14/2020	BAW	Attention to accounting and fee application issues.	0.1	\$295.00	\$29.50
1/21/2020	CG	Review and revise monthly.	1.1	\$340.00	\$374.00
1/22/2020	JPW	Review monthly; emails re same.	0.5	\$795.00	\$397.50
1/22/2020	CG	Review and revise monthly.	0.6	\$340.00	\$204.00
1/24/2020	CG	Review, revise, and finalize monthly fee app (.8); communications w/ local counsel re same (.1).	0.9	\$340.00	\$306.00
1/29/2020	CG	Draft and finalize certificate of no objection re C&D Dec. monthly (.4); update materials re 4th interim (.3).	0.7	\$340.00	\$238.00
Total			3.90		\$1,549.00
.10 Litigation					
1/6/2020	JAL	Emails re revised form of proposed lift-stay order.	0.1	\$795.00	\$79.50
1/7/2020	JPW	Emails re client inquiry.	0.6	\$795.00	\$477.00
1/10/2020	JAL	Email exchanges re lift-stay order.	0.4	\$795.00	\$318.00
1/16/2020	JAL	Correspondence re lift-stay matter.	0.5	\$795.00	\$397.50

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
1/17/2020	JAL	Review of correspondence re de bene esse deposition and lift-stay orders (0.2); draft and revise email to J. Prol and C. Malone re same (0.3).	0.5	\$795.00	\$397.50
Total			2.10		\$1,669.50
.11 Plan & Disclosure Statement					
1/6/2020	JPW	Emails re plan issues (0.5); teleconference J. Prol re plan issues (0.4).	0.9	\$795.00	\$715.50
1/7/2020	JAL	Further analysis and revisions to draft exit loan agreement and related intercreditor agreement.	5.9	\$795.00	\$4,690.50
1/8/2020	JAL	Further analysis of and revisions to draft exit loan agreement and intercreditor agreement.	0.6	\$795.00	\$477.00
1/8/2020	JPW	Telephonic message re plan issues (0.2); emails re plan issues (0.3).	0.5	\$795.00	\$397.50
1/9/2020	JAL	Further analysis and revisions to draft exit loan agreement and related intercreditor agreement (4.3); confer with JPW re developments and next steps (0.3).	4.6	\$795.00	\$3,657.00
1/9/2020	JPW	Meet with JAL re plan issues.	0.3	\$795.00	\$238.50
1/13/2020	JAL	Review of correspondence from JPW and K. Quinn re confirmation-related insurance issues and confer with JPW re same (0.4); further analysis of and revisions to draft exit loan agreement and intercreditor agreement (2.1).	2.5	\$795.00	\$1,987.50
1/13/2020	JPW	Emails re plan issues (0.7); meet with JAL re plan issues (0.2).	0.9	\$795.00	\$715.50
1/14/2020	JPW	Emails re plan issues.	0.5	\$795.00	\$397.50
1/16/2020	JAL	Teleconference with K. Quinn, E. Grim, and JPW re confirmation-related insurance issue.	0.3	\$795.00	\$238.50
1/16/2020	JPW	Teleconference J. Prol, K. Quinn, JAL re plan issues.	0.3	\$795.00	\$238.50
1/17/2020	JPW	Teleconference J. Prol re plan issues (0.2); emails re plan issues (1.6).	1.8	\$795.00	\$1,431.00
1/20/2020	JAL	Conference call with JPW, K. Quinn, Debtors' counsel, and FCR's counsel re confirmation-related insurance issue and next steps.	0.8	\$795.00	\$636.00
1/20/2020	JPW	Teleconference E. Harron re plan issue (0.2); teleconference Debtors, FCR, JAL re plan issues (0.8); emails re plan issues (1.1).	2.1	\$795.00	\$1,669.50
1/21/2020	JAL	Draft and revise email to JPW and K. Quinn re confirmation-related insurance issue.	0.3	\$795.00	\$238.50
1/22/2020	JPW	Emails re plan issues.	0.3	\$795.00	\$238.50
1/30/2020	JAL	Further analysis and editing of draft exit loan agreement.	1.0	\$795.00	\$795.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
1/30/2020	BAW	Factual research re plan issues and prepare materials re same.	0.2	\$295.00	\$59.00
1/31/2020	JPW	Emails re plan issues.	0.2	\$795.00	\$159.00
Total			24.00		\$18,980.00
.17 Docket Review & File Maintenance					
1/9/2020	BAW	Factual research re recent filings and communication re same (.3); prepare materials re same (.6).	0.9	\$295.00	\$265.50
1/21/2020	BAW	Factual research re recent filings and communication re same (.2); prepare materials re same (.5).	0.7	\$295.00	\$206.50
1/30/2020	BAW	Factual research re recent filings and communication re same (.2); prepare materials re same (.4).	0.6	\$295.00	\$177.00
Total			2.20		\$649.00
.18 Fee Applications-Others					
1/27/2020	JPW	Review CO monthly.	0.3	\$795.00	\$238.50
1/27/2020	CG	Review and revise Charter Oak monthly (.7); communications w/ JPW re same (.1).	0.8	\$340.00	\$272.00
1/29/2020	CG	Review and finalize Charter Oak fee application (.4); communications w/ local counsel re same (.1).	0.5	\$340.00	\$170.00
Total			1.60		\$680.50
Total Professional Services			34.2		\$23,664.00

PERSON RECAP

Person		Title	Hours	Rate	Amount
JAL	Jeffrey A. Liesemer	Member	17.5	\$795.00	\$13,912.50
JPW	James P. Wehner	Member	9.2	\$795.00	\$7,314.00
CG	Cecilia Guerrero	Paralegal	5.0	\$340.00	\$1,700.00
BAW	Brigette A. Wolverton	Paralegal	2.5	\$295.00	\$737.50

DISBURSEMENTS

Date	Description of Disbursements	Amount
01/14/2020	Epiq eDiscovery Solutions - Services 12/2019 [.18]	\$1.58
01/23/2020	Pacer Service Center - BAW Usage Charges 10/1 - 12/31/19 [.18]	\$551.50
01/23/2020	Pacer Service Center - CG Usage Charges 10/1 - 12/31/19 [.18]	\$28.90
01/23/2020	Pacer Service Center - JAL Usage Charges 10/1 - 12/31/19 [.18]	\$2.40

DISBURSEMENTS

Date	Description of Disbursements	Amount
01/27/2020	Miscellaneous - NJ Lawyers' Fund annual dues (JPW) [.04]	\$218.36
	Total Disbursements	\$802.74
	Total Services	\$23,664.00
	Total Disbursements	\$802.74
	Total Current Charges	\$24,466.74

EXHIBIT B



Order Filed on November 9, 2018
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
**Caption in Compliance with D.N.J. LBR
9004-1**

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*Proposed Local Counsel for the Official
Committee of Asbestos Claimants*

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

DURO DYNE NATIONAL CORP., *et al.*,

Debtors.¹

Chapter 11

Case No. 18-27963 (MBK)

(Jointly Administered)

**[PROPOSED] ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF
CAPLIN & DRYSDALE, CHARTERED, AS THE COMMITTEE'S COUNSEL,
EFFECTIVE *NUNC PRO TUNC* AS OF SEPTEMBER 26, 2018**

The relief set forth on the following pages, numbered two (2) through and including three (3), is
hereby **ORDERED**.

DATED: November 9, 2018

Honorable Michael B. Kaplan
United States Bankruptcy Judge

Page: 2
Debtor: Duro Dyne National Corp., *et al.*
Case No.: 18-27963 (MBK)
Caption: Order Authorizing the Employment and Retention of Caplin & Drysdale, Chartered, as the Committee's Counsel, Effective *Nunc Pro Tunc* as of September 26, 2018

Before this Court is the *Application of the Official Committee of Asbestos Claimants for an Order Authorizing the Employment and Retention of Caplin & Drysdale, Chartered, as the Committee's Counsel, Effective Nunc Pro Tunc as of September 26, 2018* (the “**Application**”), which was filed by the Official Committee of Asbestos Claimants (the “**Committee**”) on October 29, 2018. Based on the record herein, and after due deliberation thereon, this Court finds and concludes that (i) the law firm of Caplin & Drysdale, Chartered (“**Caplin & Drysdale**”), does not represent any entity having an interest adverse to the Committee or to the asbestos-related creditors of the Debtors’ estates in connection with the matters for which the Committee proposes to employ Caplin & Drysdale; (ii) Caplin & Drysdale is a “disinterested person” pursuant to §§ 101(14) and 328(c) of the Bankruptcy Code; (iii) proper and adequate notice of the Application has been given and no other or further notice is necessary; and (iv) the Committee’s employment and retention of Caplin & Drysdale as its counsel should be approved. Accordingly, **IT IS HEREBY ORDERED**, that:

1. The Application is granted and approved;
2. The Committee is authorized to employ and retain Caplin & Drysdale as its counsel on the terms set forth in the Application, pursuant to §§ 328 and 1103 of the Bankruptcy Code, effective *nunc pro tunc* as of September 26, 2018;
3. Caplin & Drysdale shall be compensated in accordance with the procedures set forth in §§ 330 and 331 of the Bankruptcy Code, the applicable Federal Rules of Bankruptcy Procedure, the orders and rules of this Court, and such other procedures as may be fixed by order of this Court;

Page: 3
Debtor: Duro Dyne National Corp., *et al.*
Case No.: 18-27963 (MBK)
Caption: Order Authorizing the Employment and Retention of Caplin & Drysdale, Chartered, as the Committee's Counsel, Effective *Nunc Pro Tunc* as of September 26, 2018

4. The requirement set forth in Local Rule 9013-1(a)(3) that any motion or other request for relief be accompanied by a memorandum of law is hereby deemed satisfied by the contents of the Application or otherwise waived;

5. This Order shall be immediately effective and enforceable upon its entry; and

6. The Court shall retain jurisdiction with respect to all matters arising or related to the implementation of this order.